



**THE LEAGUE
OF WOMEN VOTERS®**
OF GREATER PITTSBURGH, Inc.

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I am Annette Shimer, president of the League of Women Voters of Greater Pittsburgh. I am also a former member of the Allegheny County Air Quality Advisory Committee.

The League recognizes that the EPA has held countless public listening sessions leading up to the creation of this proposed rule, and we commend the EPA for holding this public hearing.

For decades the League has supported federal controls of air pollution from many sources. On the federal, state and local level the League has promoted coordination of government responsibilities and activities.

In Allegheny County the League began to study the effects of air pollution in the early 1970s and has since advocated for effective air pollution control and adequately funded and staffed agencies. We have supported participation in regional air pollution control arrangements.

Over many years, U.S. citizens have been expected to trade respiratory health for industry and business prosperity. However, through the efforts of citizens and government agencies, concentrations of many pollutants emitted into the air have been significantly reduced and public health has been improved. For the most part, business has succeeded and thrived.

Now citizens are being asked by industry and business interests to trade the future health of the planet for their prosperity. Climate change brought on by carbon and methane emissions is beginning to raise the global temperature, raise sea levels endangering many communities, create more extreme weather events, and disrupt both agricultural patterns and ocean acid levels endangering food production.

We have a moral obligation to change that trade-off; we can do so by setting the first-ever limits on carbon pollution from power plants to reduce the 40 percent of the carbon pollution in the United States that they produce. The EPA-proposed rule revises the trade-off to better protect the health of the earth and its inhabitants including future human generations. We applaud that proposal.

Here in Allegheny County we remember the success of the 1970s implementation strategy for the Clean Air Act of federal goals and a state implementation plan that delegated authority to the county to address unique conditions. We believe that the EPA's proposal to provide flexibility to the states and build on state leadership to achieve carbon reductions is appropriate and will be effective. Pennsylvania already has programs in place that could be part of its individual or regional plan to reduce carbon pollution, including:

- Energy efficiency codes for residential and commercial buildings
- Renewable energy portfolio standards or goals

The League also looks forward to the economic impact of innovation and investment in new clean energy technologies that will create a new generation of clean energy jobs. The return on that investment will be substantial. Since 1970, every dollar invested in compliance with Clean Air Act standards has yielded \$4-8 in economic benefits. In addition, some of the economic devastation of extreme weather events will be avoided.

We understand that there will be rate increases for electric power and that the effects of increased rates are concerns that business and industry are voicing. But the prices of the products and services they provide should cover all the costs of production. Offloading costs on the public in the form of health care expenses and now climate change effects is a violation of the basic market-based economic system that business interests profess to support.

We also understand the possible hardships of rate increases for low-income people. On the other hand, climate change effects often fall disproportionately on these same people.

Finally, we have concerns with the reputed advantage of gas over coal. The League's study on Marcellus Shale Gas Extraction noted "shale gas production has an 8-11% larger GHG footprint than conventional gas over the life cycle" although this could change with improved practices. We hope that eventually EPA will address methane emissions.

Thank you.